

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL SALAZAR, Individually and on behalf of all  
others similarly situated,

Case No. 1:22-cv-07935-JLR

Plaintiff,

vs.

NATIONAL BASKETBALL ASSOCIATION,

Defendant.

**NATIONAL BASKETBALL ASSOCIATION'S NOTICE OF MOTION TO DISMISS  
PLAINTIFF'S FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Hilary L. Preston, sworn to on January 13, 2025, and the exhibits attached thereto, and the accompanying Memorandum of Law in Support of this Motion, Defendant National Basketball Association, by its attorneys, Vinson & Elkins L.L.P., respectfully moves this Court, before the Honorable Jennifer L. Rochon, United States District Judge, United States District Court, Southern District of New York, at 500 Pearl Street, Courtroom 20B, City of New York, at a date and time to be set by the Court, for an order dismissing the First Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted.

Dated: January 13, 2025

Respectfully submitted,

**VINSON & ELKINS L.L.P.**

By: /s/ Hilary L. Preston

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